

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

BRUCE ROCKWELL, *on behalf of himself and
others similarly situated,*

Plaintiff,

v.

MEDICUS HEALTHCARE SOLUTIONS,
LLC,

Defendant.

Case No.: 1:24-cv-00128

NOTICE OF MOTION TO ADMIT MAX S. MORGAN *PRO HAC VICE*

PLEASE TAKE NOTICE that, upon the annexed supporting documents, Plaintiff Bruce Rockwell (“Plaintiff”) will move this Court, pursuant to Rule 83.1 of the Local Rules of the United States District Court for the Western District of New York, for an Order allowing the admission of Max S. Morgan of The Weitz Firm, LLC, and a member in good standing of the Bar of the Commonwealth of Pennsylvania and the State of New Jersey, as attorney *pro hac vice* to argue or try this case in whole or in part as counsel for Plaintiff.

Dated: February 22, 2024

/s/ Javier L. Merino

Javier L. Merino

THE DANN LAW FIRM

1520 U.S. Highway 130, Suite 101

North U.S. Highway 130, Suite 101

North Brunswick, NJ 08902

notices@dannlaw.com

Tel: (201) 355-3440

Fax: (216) 373-0536

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

<p>BRUCE ROCKWELL, <i>on behalf of himself and others similarly situated,</i></p> <p style="text-align: center;"><i>Plaintiff,</i></p> <p>v.</p> <p>MEDICUS HEALTHCARE SOLUTIONS, LLC,</p> <p style="text-align: center;"><i>Defendant.</i></p> <hr style="width: 100%;"/>	<p>Case No.: 1:24-cv-00128</p>
--	--------------------------------

MOTION TO ADMIT MAX S. MORGAN *PRO HAC VICE*

Plaintiff Bruce Rockwell (“Plaintiff”), pursuant to Rule 83.1 of the Local Rules of the United States District Court for the Western District of New York, hereby moves this Court for an Order allowing the admission of Max S. Morgan of The Weitz Firm, LLC, and a member in good standing of the Bar of the Commonwealth of Pennsylvania and the State of New Jersey, as attorney *pro hac vice* to argue or try this case in whole or in part as counsel for Plaintiff. In support, Plaintiff attaches herewith the following completed documents:

- Admission Petition Form;
- Admission Sponsor Affidavit;
- Attorney’s Oath;
- Civility Principles and Guidelines Oath; and
- Attorney Database and Electronic Case Filing Registration Form.

In further support, Plaintiff, through undersigned counsel, states that Mr. Morgan is a member in good standing of the Bars of the Commonwealth of Pennsylvania and the State of New Jersey, and is admitted to the United States District Court for the Eastern District of Pennsylvania (see Certificate of Good Standing attached) as well as other Federal Courts as more fully set forth

in the attached petition. There are no disciplinary proceedings against Mr. Morgan in any state or federal court.

WHEREFORE, for good cause shown, Plaintiff hereby requests the Court grant this Motion and admit Max S. Morgan *pro hac vice* in the above matter. A proposed order is submitted herewith.

Dated: February 22, 2024

s/ Javier L. Merino
Javier L. Merino
THE DANN LAW FIRM
1520 U.S. Highway 130, Suite 101
North U.S. Highway 130, Suite 101
North Brunswick, NJ 08902
notices@dannlaw.com
Tel: (201) 355-3440
Fax: (216) 373-0536

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

BRUCE ROCKWELL, *on behalf of himself and
others similarly situated,*

Plaintiff,

v.

MEDICUS HEALTHCARE SOLUTIONS,
LLC,

Defendant.

Case No.: 1:24-cv-00128

**ORDER GRANTING ADMISSION *PRO HAC VICE*
TO ATTORNEY MAX S. MORGAN**

The motion for admission to practice *pro hac vice* in the above-captioned matter is hereby GRANTED. The admitted attorney, Max S. Morgan, is permitted to argue or try this particular case in whole or in part as counsel or advocate for Plaintiff Bruce Rockwell.

An attorney admitted to practice *pro hac vice* is required to pay a \$200.00 attorney admission fee and present this Order to the intake deputy clerk in the Clerk's Office. When paying by mail, return a copy of this Order to this Clerk's Office with the required fee.

This Order confirms your appearance as counsel in this case, and it will be entered on the Court's docket. A notation of your admission *pro hac vice* in the above-captioned case will be made on the roll of attorneys.

The attorney admitted *pro hac vice* must service a copy of this Order on all other counsel in this case.

DATED: _____

United States District Judge

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

IN THE MATTER OF THE APPLICATION OF

Max S. Morgan, Esquire

(Name)

TO BE ADMITTED TO PRACTICE AS AN ATTORNEY

TO THE HONORABLE Lawrence J. Vilardo ,
JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK:

Max S. Morgan, Esquire , petitioner herein, respectfully states:

1. That petitioner has an office for the practice of law at:

The Weitz Firm, LLC 1515 Market Street, #1100, Philadelphia, PA 19102

2. That petitioner attended the following educational institutions and received the following degrees:

Rutgers School of Law - Camden (JD); Pennsylvania State University (BS)

3. Please complete either (a), (b), or (c):

Admission by Petition

(a) That petitioner was admitted to practice by the Appellate Division of the Supreme Court, _____ Department of the State of New York on the _____ day of _____, _____.

Additional Requirements:

Admission Petition Form

Admission Sponsoring Affidavit

Attorney's Oath

Civility Principles Oath

Attorney Database and Electronic Case Filing Registration Form

Check or money order in the amount of the Attorney Admission fee set forth in the District Court Schedule of Fees
(due on upon admission)

Admission by Certificate of Good Standing

(b) That petitioner was admitted to practice in the United States District Court of the Middle District of Pennsylvania on the 8th day of October, 2021, and is a member of the bar of the State in which that district court is located and in which the petitioner maintains an office for the practice of law.

Additional Requirements:

Original Certificate of Good Standing from the Clerk of Court of which he or she is a member
(dated no earlier than six months prior to submission to this Court)

Admission Petition Form (when attorney admitted to a District Court outside of New York State)

Attorney's Oath

Civility Principles Oath

Attorney Database and Electronic Case Filing Registration Form

Check or money order in the amount of the Attorney Admission fee set forth in the District Court Schedule of Fees
(due on upon admission)

Pro Hac Vice Admission

(c) That petitioner is admitted to practice in the State of Pennsylvania.

Additional Requirements:

Motion to Appear Pro Hac Vice
Admission Petition Form
Admission Sponsoring Affidavit
Attorney's Oath
Civility Principles Oath
Attorney Database and Electronic Case Filing Registration Form
Check, money order, or payment of fee online in the amount of the Pro Hac Vice fee set forth in the District Court
Schedule of Fees (due upon application)

4. Petitioner is admitted to the following courts:

PA, NJ, EDPA, DNJ, Fed. Cir., Supreme Court, EDWIS, WDWIS, NDIL, INND, 6th Cir., MIED, MDPA, NDOH, NDTEX, SDTEX, WDTENN

5. Since such admission(s), petitioner has practiced in the following courts:

PA, NJ, EDPA, DNJ, Fed. Cir., Supreme Court, EDWIS, WDWIS, NDIL, INND, 6th Cir., MIED, MDPA, NDOH, NDTEX, SDTEX, WDTENN

and has been involved in the following professional activities:

Active Litigation Practice, Phila. Bar Association

6. Please respond separately to each of the following questions:

- (a) Have you ever been held in contempt of court? ☐ Yes ☒ No
- (b) Have you ever been sanctioned by a court? ☐ Yes ☒ No
- (c) Have you ever been publicly censured, admonished, advised, or cautioned in a disciplinary proceeding? ☐ Yes ☒ No
- (d) Have you ever been suspended or disbarred by any court? ☐ Yes ☒ No
- (e) Have you ever been denied admission or readmission to the Bar of any court? ☐ Yes ☒ No
- (f) Are you now the subject of any pending disciplinary proceeding OR the subject of any pending disciplinary complaint before any court? ☐ Yes ☒ No


In the case of each affirmative answer to a question set forth above, the applicant shall file a confidential statement under seal disclosing the identity of the responsible court or disciplinary committee, as well as the date, background, outcome and any facts of a mitigating or exculpatory nature as may be pertinent. Such confidential statement, together with the petition, shall promptly be transmitted by the Clerk to the Chief Judge of the District for review.

7. That petitioner has read and is familiar with the provisions of Title 28 of the United States Code which pertains to jurisdiction of and venue in a United States District Court, the Federal Rules of Civil and Criminal Procedures, the Federal Rules of Evidence, the Local Rules of Practice for the United States District Court for the Western District of New York, the Code of Professional Responsibility as adopted by the Appellate Division of the State of New York and as interpreted and applied by the United States Supreme Court, the United States Court of Appeals for the Second Circuit, and this Court.

WHEREFORE, the petitioner respectfully requests to be admitted as an attorney in the United States District Court for the Western District of New York.

I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: 2/16/2024
(Date)


(Signature of Petitioner)

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

IN THE MATTER OF THE APPLICATION OF

Max S. Morgan

(Name of Petitioner)

TO BE ADMITTED TO PRACTICE AS AN ATTORNEY

SPONSORING
AFFIDAVIT

STATE OF NEW JERSEY) ss:

COUNTY OF MIDDLESEX

Javier L. Merino

Name of Sponsor

, being duly sworn deposes and says:

1. I reside at: Fairfield, New Jersey
City, State

and maintain an office for the practice of law at: North Brunswick, NJ

2. I am an attorney at law, admitted to practice in the United States District Court for the Western District of New York

I was admitted to practice in the United States District Court for the
Western District of New York on the 22nd day of February, 2018.

3. I have known the petitioner since July 2021 and under the following
circumstances: We have co-counseled on several consumer matters together.

4. I know the following about the petitioner's moral character and fitness to be admitted to practice in this Court: Mr. Morgan
zealously advocates for consumers and keeps their best interests at heart. He also keeps the upmost respect for the courts, especially
those which have graciously granted him pro hac vice admission

I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: February 22, 2024
Date

Javier L. Merino

Signature of Sponsoring Attorney

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

ATTORNEY'S OATH

STATE OF Pennsylvania)
Philadelphia) SS:
COUNTY)


I, Max S. Morgan, Esquire of Philadelphia, Pennsylvania

City, State

do solemnly swear or affirm that I will demean myself, as an attorney and counselor of the United States District Court for the Western District of New York, uprightly and according to law; and I will support the Constitution of the United States. So help me God.

I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: 2/16/2024
Date


Signature of Attorney

Sworn to and subscribed before me
this 2nd day of Feb 20 24.

Commonwealth of Pennsylvania - Notary Seal
Marlo C. Hackney, Notary Public
Philadelphia County
My Commission Expires October 6, 2027
Commission Number 1064759



**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

APPENDIX TO CIVILITY PRINCIPLES

OATH OF OFFICE

I do solemnly swear (or affirm):

I will support the Constitution of the United States and the Constitution of the State of New York; I will maintain the respect due to Courts of Justice and judicial officers;

I will not counsel or maintain any suit or proceeding which shall appear to me to be unjust nor any defense that I do not believe to be honestly debatable under the law of the land;

In maintaining the causes confided to me, I will employ only means that are honorable, and will never seek to mislead the judge or jury by an artifice or false statement of fact or law;

I will maintain the confidences and preserve inviolate the secrets of my client, and will accept compensation solely from the client or a third-party with the knowledge and approval of the client;

I will abstain from all offensive behavior and advance no fact prejudicial to the honor and reputation of a party or witness, unless my ethical duty requires;

I will in all other respects conduct myself personally and professionally in conformity with the high standards of conduct imposed upon members of the bar who practice law in this State and before this Court.

A handwritten signature in black ink, appearing to be 'MAG', is written over a horizontal line.

(Signature)

UNITED STATES DISTRICT COURT

Western District of New York

ATTORNEY DATABASE & ELECTRONIC CASE FILING REGISTRATION FORM

The Clerk's Office maintains a database of attorneys admitted in the District. To ensure the data we enter for you is correct, please fill out the form below and submit it with your other papers when you are admitted. Our local rules require you to report changes to your name, firm affiliation, office address, email, and/or phone number within 30 days.

This form shall also be used to register for an account on the Courts' Case Management/Electronic Files (CM/ECF) system. Registered attorneys will have privileges to electronically submit and to view the electronic docket sheets and documents. By registering, attorneys consent to receiving electronic notice of filings through the system. The following information is required for registration.

Instructions: PLEASE TYPE OR PRINT. If you use two surnames or have a hyphenated surname, please indicate how you would like the name entered into our records, i.e., first surname as middle name, both surnames in last name field, etc.

Check One: <input checked="checked" type="checkbox"/> New Registration		<input type="checkbox"/> Update Address/Email/Phone	
First Name: <u>Max</u>			
Middle Name or Initial: <u>S</u>			
Last Name: <u>Morgan</u>			
Firm Name: <u>The Weitz Firm, LLC</u>			
Firm Address: <u>1515 Market Street</u>			
Suite: <u>#1100</u>			
City: <u>Philadelphia</u>		State: <u>Pennsylvania</u>	Zip: <u>19102</u> - <u></u>
Phone Number: <u>267</u> - <u>587</u> - <u>6240</u>		FAX Number: <u>215</u> - <u>689</u> - <u>0875</u>	
Primary E-Mail Address: <u>max.morgan@theweitzfirm.com</u>			
Additional E-Mail Address(es) to receive notices: <u></u>			
<u></u>			

Attorneys seeking to file documents electronically must be admitted to practice in the United States District Court for the Western District of New York.

Method of Admission: pro hac vice

(Petition, Certificate of Good Standing, *pro hac vice*)

Date admitted to practice in this Court: pending

(write "pending" if admission is pending)

If admitted pro hac vice:

Date motion for pro hac vice granted: _____ in case number: _____

Government attorneys do not need to seek admission. United States Attorneys, Assistant United States Attorneys, special attorneys appointed under 28 U.S.C. §§ 515 and 543, Federal Public Defenders, Assistant Federal Public Defenders, and any attorney employed by a federal agency, may practice before this Court on any matter within the scope of their employment by submitting to the Clerk of Court this Electronic Case Filing Registration Form and filing a notice of appearance as required by Local Rule of Civil Procedure 83.2(b).

By submitting this registration form, the undersigned agrees to abide by all Court rules, orders and policies and procedures governing the use of the electronic filing system. The undersigned also consents to receiving notice of filings pursuant to Fed. R. Civ. P. 5(b) and 77(d) via the Court's electronic filing system. The combination of user id and password will serve as the signature of the attorney filing the documents.

Attorneys must protect the security of their passwords and immediately notify PACER and the court if they learn that their password has been compromised.



Signature of Registrant

2/16/2024

Date

Please note that this form is required to be completed by any attorneys seeking to be admitted to this District and submitted with the admission application. If you have been previously admitted to practice in this court and need to update your contact information or are a government attorney submitting this registration to request an account or, you may email the form to CMECF_Support@nywd.uscourts.gov, or mail it to the following address:

Mary C. Loewenguth
United States District Court
Attn: CM/ECF Registration
2 Niagara Square
Buffalo, New York 14202

CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA

}

}

}

Middle District of Pennsylvania

I, Peter J. Welsh, Clerk of the United States District Court, Middle District
of Pennsylvania, Do Hereby Certify that Max Morgan, Esquire
was duly admitted to practice in said Court October 8, 2021, and is in good standing as a
member of the bar of said Court.

Dated at Scranton, Pennsylvania
on November 30, 2023

PETER J. WELSH, CLERK OF COURT

By 2/ Emily C. Aikens
Deputy Clerk